

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**ADDICTION & DETOXIFICATION )  
INSTITUTE, LLC, a New Jersey Limited )  
Liability Corporation )**

**Plaintiff,**

**v.**

**THOMAS C. YEE, MD, an individual, )  
d/b/a/ Las Vegas Rapid Detox, )**

**Defendants.**

**Civil Action No. 1:14-CV-05648  
Judge Edmond E. Chang**

**MOTION FOR EXTENSION OF TIME FOR INITIAL STATUS REPORT AND DATE  
FOR INITIAL STATUS HEARING**

Comes now Thomas Keith Mirabile, Counsel for Plaintiff Addiction & Detoxification Institute, LLC and in support of Plaintiff's motion for extension of time states for initial status report and status hearing set before this court on the 22nd of September 2014 for the following reasons to wit

Counsel for the Plaintiff has received notification and is scheduled for two hearing before the United States Citizenship and Immigration Service ( USCIS) on Monday the 22nd of September at USCIS in Chicago.

That counsels associate counsel is currently in Korea .

The nature of the settings by USCIS do not lend themselves to continuances as the dates are chosen by Immigration without consultation with counsel.

That requests for extensions impose massive delays on resetting causing hardship and extensive delay on clients' cases. That this instant case, Defendant has been just recently served and has not answered the complaint, and has requested 45 days from the date of accepting service of August 22<sup>nd</sup>, 2014 to which plaintiff does not object, and as such the status report and status hearing may be precipitous

That counsel for the plaintiff and defendant have discussed this conflict and that the parties agree to this motion for extension and that defendant joins in the motion for extension of time.

Wherefore Plaintiff and Defendant request that the status hearing set for September 22<sup>nd</sup>, 2014 at 9:30am and the initial status report due for submission on the 19th of September be continued to a date certain to allow for the response of defendant to plaintiffs complaint or other pleading and that the date for status report and status hearing be set to a new date preferably on the 20, 21st or 22<sup>nd</sup> of October 2014

That this motion is not for the purpose of delay and will not result in a prejudice to the parties to this action

Respectfully Submitted,

Addiction & Detoxification Institute, LLC

By: /s/ Thomas Keith Mirabile

Attorney for Plaintiff

Thomas Keith Mirabile, Esq. (ARDC# 1927728)  
Mirabile Law Firm  
1745 S Naperville Rd, Suite 200  
Wheaton, IL 60189  
(630) 665-6904; (630) 665-4343